

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
WHEELING DIVISION

DIANA MEY, on behalf of herself
and a class of others similarly situated,

Plaintiff,

Civil Action No. 5:24-CV-55

v.

WILLIAM PINTAS,
P&M LAW FIRM, LLC,
P&M LAW FIRM (PR), LLC,
RELIANCE LITIGATION LLC, and
JAMES RYDER INTERACTIVE LLC

Defendants.

PLAINTIFF'S MOTION FOR ANTI-SUIT INJUNCTION

Anticipating this lawsuit under the Telephone Consumer Protection Act, Defendant P&M Law Firm (PR), LLC filed a preemptive lawsuit against Mey in the Commonwealth of Puerto Rico's Court of First Instance. That lawsuit is plainly without appropriate basis or jurisdiction and was filed only as a means to harass and burden Mey with a costly defense. And because the lawsuit urges the Puerto Rican commonwealth court to resolve Mey's federal claims under the auspices of declaratory judgment, an anti-suit injunction is necessary to protect Mey from irreparable harm and defend this Court's own jurisdiction over the federal claims. As such, Mey moves for a temporary restraining order and preliminary injunction enjoining Defendant P&M Law Firm (PR)—as well as its owner and affiliate, William Pintas and P&M

Law Firm, LLC—from further prosecuting claims against Mey in the Puerto Rican commonwealth court.¹

The grounds for same are set forth more fully in the accompanying memorandum of law.

DIANA MEY

By Counsel:

/s/ Ryan McCune Donovan
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¹ Pursuant to the requirements of Federal Rule of Civil Procedure 65(b)(1)(B), Ms. Mey's counsel certifies that, although no counsel has yet appeared on behalf of the Defendants in this matter, counsel has attempted to provide notice of this motion to the Defendants' known attorneys via e-mail, contemporaneous with this filing.

Certificate of Service

I hereby certify that, on April 25, 2024, a copy of the foregoing docket was served via the Court's electronic filing system.

/s/ Ryan McCune Donovan
Ryan M. Donovan (WVSB #11660)